

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

EXHIBIT

13

WILLIAM STEVENS,

Plaintiff,

v.

Civil Action No. 04-11938 JLT

ROBERT HOWLAND, et al.,

Defendants.

AFFIDAVIT OF WILLIAM MILHOMME

I, William Milhomme, do on oath depose and state:

1. I am an employee of the Massachusetts Department of Correction ("DOC") and presently serve as the Director of Volunteer Services for the Department's Program Services Division. I have held this position since July, 2005.

2. As the Director of Volunteer Services, I am responsible for the supervision of the volunteer programs within the DOC. One of my primary duties is to work with community groups in order to look for individuals willing to work as volunteers in a DOC facility in various capacities. I spend a great deal of my time working with community religious organizations and groups in an attempt to bring in volunteers to work with the various inmate religious groups.

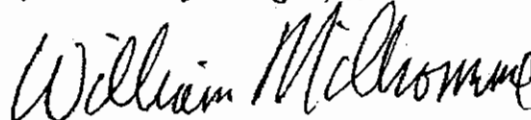
3. The DOC recognizes 15 religions, including Buddhist, Christian Scientists, Greek Orthodox, Hare Krishnas, Muslims, Jehovahs' Witnesses, Jews, Mormons, Native Americans, Protestants, Rastafarians, Quakers, Roman Catholics, Scientologists and Wiccans. The DOC provides chaplains who are Catholic, Muslim, Protestant and Jewish for many of its prisons and relies upon community volunteers to work with inmates who belong to the other religions.

4. Presently, there are no Wicca volunteers working in any DOC facility, but I am working to change that situation. As part of my efforts to bring volunteers from community religious organizations into the prisons, I have spent a considerable amount of time searching for

volunteers from the Wicca community to work with inmates in DOC facilities. Based on my efforts, I have learned that, unlike established mainstream religions, the Wicca community does not maintain a national organization, but consists of small local groups called covens. Fortunately, as a result of my prior employment with the Office of Massachusetts Secretary of State, Field Archivist/Grants Manager with the Office of Massachusetts Secretary of State, I have developed a number of contacts within the Wicca community in this state and surrounding states. Presently, after considerable effort, I have made contact with covens in Connecticut (Covenant of Goddess), and Marlborough, Massachusetts (Society of Elder Faith), and Williamsburg, Massachusetts (EarthSpirit), and one in Duxbury, Massachusetts (First Church of Wicca). The coven in Duxbury, Massachusetts is not far from the Massachusetts Treatment Center and I have discussed with the coven leaders the possibility that they could provide Wicca volunteers to work with the Wiccan groups in DOC facilities located in Southeastern Massachusetts. Recently, I was advised by the Duxbury coven that while there is interest among their members in volunteering at a DOC facility, they are presently not able to participate in the DOC volunteering program and will contact me in the future when they are ready to participate.

4. Despite the difficulty in locating Wicca covens in Massachusetts and neighboring states that are willing to provide volunteers, I will continue in my efforts to locate Wicca volunteers willing to work with Wiccan groups in DOC facilities, including the Treatment Center. I remain hopeful that volunteers from the Wicca community willing to work with incarcerated individuals will be located.

Signed under the pains and penalties of perjury this 29th day of August, 2006.



William Milhomme